

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Northern Division)

MELVIN NEWSOME, ET AL.

Plaintiffs,

v.

UP-TO-DATE LAUNDRY, INC., ET AL.,

Defendants.

Civil Action No. S01-2257 (WDQ)

**JOINT MOTION TO REVISE THE SCHEDULING ORDER**

Plaintiffs and defendants jointly request that the Scheduling Order in this case be revised to postpone the existing discovery and motions deadlines for thirty-seven days. The new deadlines are set forth in the attached proposed Order. In support of this request, the parties state as follows:

1. The current Scheduling Order sets a discovery deadline of April 17, 2003.
2. The parties have been working diligently to conduct discovery in this case during the past month. During the month of March and the first two weeks of April, the parties took a total of nine depositions, four for plaintiffs and five for defendants.
3. The parties have discussed scheduling four more depositions, three more for the plaintiffs and an additional one for the defendants, but at this point have been unable to schedule convenient deposition dates within the remaining discovery period. Plaintiffs plan to resume the continued depositions of President Brad Minetree and Up-To-Date accountant Carroll Weyrich (who is in the middle of tax season at this point). The parties also plan to take the depositions of each of their statistical experts.

4. On March 24, 2003, the Court ordered that Defendants respond to four outstanding document requests. Defendants have not yet responded to three of those requests and have responded in part to the remaining request. Plaintiffs want to review these document responses to prepare for the depositions of President Brad Minetree and Carroll Weyrich.

5. Both undersigned counsel and counsel for defendants have scheduled pre-planned travel during the month of April. In addition, counsel for defendants has scheduled a number of depositions to occur in the first two weeks of May in two other pending matters, Van Eaton v. Oldfield School (pending in Circuit Court in Baltimore County), and Cooper v. District International Trucks (pending in U.S. District Court for the Southern District of Maryland), which makes scheduling the remaining depositions in the case at bar more difficult.

6. Counsel for both parties jointly make this request to extend the discovery deadline by thirty-seven days.

Accordingly, the parties hereby request that their motion be granted and that the Scheduling Order be modified as provided on the attached proposed Order.

Respectfully submitted,

/s/

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Philip J. Simon, #12893  
 Richard A. Salzman  
 Douglas B. Huron  
 Betty Grdina #15647  
 HELLER, HURON, CHERTKOF,  
 LERNER, SIMON & SALZMAN  
 1730 M Street, N.W., Suite 412  
 Washington, DC 20036-4505  
 (202) 293-8090  
 (202) 293-7110 (f)

Counsel for Plaintiffs

/s/

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Jeanne M. Phelan  
WHITEFORD TAYLOR & PRESTON  
Seven Saint Paul Street  
Baltimore, MD 21202-1626  
(410)347-8738  
(410) 347-9446 (fax)

Counsel for Defendants